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SOAH DOCKET NO. 473-19-6862  
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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY FOR §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY AUTHORIZATION § OF  
AND RELATED RELIEF FOR THE §  
ACQUISITION OF WIND § ADMINISTRATIVE HEARINGS  
GENERATION FACILITIES §

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO  
CITIES ADVOCATING REASONABLE DEREGULATION'S FOURTH SET OF  
REQUESTS FOR INFORMATION**

**FEBRUARY 24, 2020**

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**Question No. 4-1:**

For the period from January 1, 2015 through January 31, 2020, please:

- a. Provide a copy of all analyses SWEPCO has undertaken or that have been undertaken on its behalf, to ascertain customer interest in more renewable energy to meet those customers' sustainability and renewable energy goals;
- b. Identify all customers of which SWEPCO is aware that have expressed an interest in more renewable energy to meet those customers' sustainability and renewable energy goals, and each such customer's renewable energy goals;
- c. Provide a copy of SWEPCO's response to such customers;
- d. State whether SWEPCO could meet such customers' sustainability and renewable energy goals through purchased power agreements for renewable energy, and if not, please explain why not.

**Response No. 4-1:**

- a. SWEPCO has not undertaken any formal analyses to quantify customer interest in sustainability and renewable energy goals. However, numerous SWEPCO customers have stated goals for renewable energy use. In many cases, they have stated their goals publicly and identified action plans for achieving them as described in the response provided in ETEC-NTEC 1-3.
- b. Please refer to the response for part a. See also CARD-4-1\_Confidential\_Attachment 1.
- c. Please refer to the response for part b.
- d. SWEPCO could meet the customers' goals through a purchased power agreement if the agreement was structured in a way that provides SWEPCO ownership of the renewable energy credits, however doing so would not offer the benefits described on pages 13 - 15 of the Direct Testimony of Tom Brice, such as the Company's guarantees offered in this case.

The attachment responsive to this request is CONFIDENTIAL under the terms of the Protective Order. The Confidential information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15<sup>th</sup> Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

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**Question No. 4-2:**

Please identify any companies of which SWEPCO is aware that decided either not to locate or not to expand their operations in SWEPCO's service area in Texas, because of SWEPCO's lack of renewable energy sources, and provide the dates those decisions were made.

**Response No. 4-2:**

SWEPCO works closely with large customers and potential customers and has knowledge and experience from those interactions that large customers find low rates very attractive in siting and expanding their operations in SWEPCO's service territory, and that large customers have expressed interest in larger proportions of their energy supply being derived from renewable resources. Please also refer to the response provided for CARD 4-1(b).

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**Question No. 4-3:**

If the Commission denies SWEPCO's amendment to its certificate of convenience and necessity ("CCN") for the Wind Project but the other states in which SWEPCO is seeking approval of the Wind Project, approve the Wind Project and each such other state is allocated its proportionate share of the share that otherwise would have been allocated to Texas ratepayers, please provide a copy of all analyses undertaken by SWEPCO, or on its behalf, that show the impact on the price that ratepayers in Texas will pay for electricity from SWEPCO during the period from the first in-service date of any part of the Wind Project through the life of the Wind Project.

**Response No. 4-3:**

If the Commission denies SWEPCO's request, the impact on the estimated average price (\$/kWh) that ratepayers in Texas will pay for electricity from SWEPCO is the proforma rate section of ERRATA EXHIBIT JOA-2. These rates assume no cost recovery of the selected wind facilities revenue requirement, no flow through of Production Tax Credits, and no energy savings resulting from the selected wind facilities.

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